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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NIKE, INC.,

Plaintiff,

v.

SKECHERS U.S.A., INC.

Defendant.

Case No. 2:23-cv-09346-AB (PVCx)

**JOINT STIPULATION FOR
PROTECTIVE ORDER AND E-
DISCOVERY ORDER**

1 Plaintiff and Counterclaim-Defendant Nike, Inc. and Defendant and Counterclaim-Plaintiff
2 Skechers, U.S.A, Inc., by and through their respective counsel, have stipulated to and jointly request
3 that the Court enter the proposed Protective Order and Order Regarding E-Discovery, which are
4 attached hereto.

5 The parties' proposed Protective Order is a modified version of Magistrate Judge Pedro V.
6 Castillo's Form Stipulated Protective Order (Apr. 2020). Consistent with Magistrate Judge Pedro
7 V. Castillo's Procedure 14, the parties believe there is good cause for entrance of the proposed
8 Protective Order for the reasons discussed in Ex. 1 to this Stipulation, including because the above
9 captioned patent litigation is likely to involve proprietary and/or valuable research, development,
10 commercial, and financial materials and information for which special protection from public
11 disclosure and from use for any purpose other than prosecution of this action is warranted. Further
12 consistent with Magistrate Judge Pedro V. Castillo's Procedure 14, the parties' proposed Protective
13 Order does not provide for the automatic sealing of all confidential documents.

1 Dated: March 12, 2024

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By: /s/ Thomas C. Werner

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ATTESTATION OF CONCURRENCE

I, Michael J. Gershoni, am the ECF User whose ID and password are being used to file this
JOINT STIPULATION FOR PROTECTIVE ORDER AND E-DISCOVERY ORDER. I
attest that, pursuant to United States District Court, Central District of California Local Rule 5-
4.3.4(a)(2), all other signatories listed above on whose behalf this filing is submitted concur in the
filing's content and have authorized this filing.

Dated: March 12, 2024

/s/ Michael J. Gershoni
Michael J. Gershoni